

**THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

MCKENNA ADVISORS LLC,

Petitioner,

v.

PGA TOUR, INC.,

Respondent.

Miscellaneous Action No. 1:23mc8

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**DECLARATION OF CAILYN REILLY KNAPP**

I, Cailyn Reilly Knapp, attorney for Petitioner McKenna Advisors LLC, declare as follows:

1. I am an attorney at the law firm of Baker Botts LLP, which represents the Petitioner in this action.
2. On April 10, 2023, counsel for the parties met and conferred by videoconference to discuss the requests for production in the amended subpoena and identify the areas of agreement and remaining disagreement, as reflected in Exhibit I attached hereto. Following that meeting, on April 11 and 12, 2023, counsel for the parties exchanged follow-up correspondence, further narrowing the disputed issues. *See* Ex. J.
3. I hereby declare under penalty of perjury that the documents attached to this declaration are true and correct copies of the following:

**Exhibit A:** PGA Subpoena to McKenna Advisors LLC, dated December 20, 2022.

**Exhibit B:** Amended PGA Subpoena to McKenna Advisors LLC, dated March 10, 2023.

**Exhibit C:** Work Order (McKenna-0000001-04), dated October 4, 2021.

- Exhibit D:** *Mickelson, et al. v. PGA Tour, Inc.*, No. 3:22cv4486 (N.D. Cal.), Complaint, dated August 3, 2022.
- Exhibit E:** *Mickelson, et al. v. PGA Tour, Inc.*, No. 3:22cv4486 (N.D. Cal.), Amended Complaint, dated August 26, 2022.
- Exhibit F:** *Jones, et al. v. PGA Tour, Inc.*, No. 5:22cv4486 (N.D. Cal.), PGA Amended Counterclaim, dated February 23, 2023.
- Exhibit G:** McKenna Letter to PGA, dated February 7, 2023.
- Exhibit H:** PGA proposed search terms.
- Exhibit I:** McKenna Agreements to Produce.
- Exhibit J:** Email chain between counsel for the parties, dated April 11–12, 2023.

Dated: April 12, 2023

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/s/  
Cailyn Reilly Knapp (VA Bar No. 86007)  
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